

Exhibit 67

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

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CENTRAL INTELLIGENCE AGENCY



DIRECTORATE OF INTELLIGENCE

22 March 2002



Al-Haramain (also known as the Haramain Islamic Foundation or HIF) is a Riyadh-based Islamic NGO funded by the Saudi Government and wealthy individuals to proselytize and conduct charity work abroad. Led by Director General

Uqail Bin Abdul-Aziz al-Uqail, HIF claims on its Web site that its goal is "conveying the true Islamic teachings throughout the world" and has an annual budget of about \$57 million, although press reports estimate its budget at \$30 million. Al-Haramain's firm backing of Islamist terrorist and militant groups worldwide under the guise of providing humanitarian assistance has drawn a reaction from the US and Saudi Arabian Governments, which froze the assets of HIF's Somali and Bosnian offices on 11 March. This paper focuses on Al-Haramain's ties to extremist groups in Africa. (U//FOUO)

In Africa, HIF maintains a presence in about a dozen countries and supports several extremist groups, particularly Somalia's al-Ittihad al-Islami (AIAI),

Al-Haramain employees also provided cover and logistic support for al-Qa'ida cells, including those involved in the 1998 US Embassy bombings in Kenya and Tanzania. Most of Al-Haramain's field office directors in East Africa are aware of and support the organization's aid to militant extremists, and at least some top-level officials from HIF's

headquarters condone the funding of extremist groups,

Humanitarian, but With a Militant Agenda

Even Al-Haramain's ostensibly legitimate activities in Africa, such as building mosques and Islamic schools, are undertaken with the goal of creating an environment conducive to militancy.

- HIF's limited relief operations and infrastructure construction projects in Africa are targeted to help only Muslim communities and propagate the fundamentalist Salafist brand of Sunni Islam.
- HIF's schools, mosques, and publications espouse Salafism's rigid orthodoxy and attack opposing secular and religious—including other Islamic—doctrines, . These efforts complement HIF employees' efforts to recruit young Africans for the jihad against the "enemies of Islam."

Backing Somalia-Based AIAI

Al-Haramain's top priority in Africa is supporting the Somali AIAI faction, . AIAI—designated by the US Government as a foreign terrorist group—seeks to establish an Islamic state in "Greater Somalia" including parts of Ethiopia, Djibouti, and Kenya. HIF offices worldwide collect funds to provide AIAI with financial support to establish Islamic schools, courts, and other institutions in AIAI-influenced territory. HIF has also helped the faction develop its insurgent and terrorist capabilities.

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- In 2002, HIF arranged travel for AIAI members to Saudi Arabia, probably to help them avoid anticipated US military action in Somalia, [REDACTED]
- In 2001, HIF provided humanitarian cover for unidentified Arabs traveling to Somalia to train AIAI military recruits, [REDACTED]
- In 1999, HIF maintained villas in Somalia used to store explosives and train AIAI members for jihad operations, [REDACTED]

Al-Haramain also supports AIAI from its offices and refugee camps in Kenya. [REDACTED]

Providing Cover for al-Qa'ida

In addition to its support of African Islamic terrorist groups, Al-Haramain's field offices in Tanzania and Kenya have aided al-Qa'ida cells, including those responsible for the 1998 US Embassy bombings.

- In 2002, Al-Haramain's office in Tanzania hid 14 extremists—at least some of whom were probably al-Qa'ida fighters fleeing Afghanistan—in the Kiwalani mosque in Dar es Salaam, [REDACTED]. While staying in the mosque, the fighters provided training to local extremists.
- In 1998, the Kenyan Government deregistered HIF for providing support to the terrorist cells that planned and carried out the bombing of the US Embassy in Nairobi, [REDACTED]. HIF and other NGOs diverted funds and helped import materials needed to build the bombs. Nairobi allowed HIF to reregister in response to pressure from Riyadh and Kenyan Muslims.

Funding Militants in East Africa

Al-Haramain misuses its status as a charitable organization to fund Islamist political parties and civic groups in Tanzania and other East African countries. In some instances, this funding extends to supporting sectarian violence. [REDACTED]

- In 2002, HIF's director in Tanzania—Ramzi Ben Mizauni—funded the most extremist mosques in the country. [REDACTED]

Al-Haramain's support to Islamic extremists in other East African countries includes:

- In 2001, Al-Haramain's office in Djibouti funded local politicians who advocated closing non-Islamic schools, courts, and recreation centers, [REDACTED]

[REDACTED]

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Coping With Increased Scrutiny [REDACTED]

The past behavior of Al-Haramain and other questionable Islamic NGOs suggests HIF will respond to the asset freezes in Somalia with a combination of scaling back some activities while finding ways to circumvent financial controls.

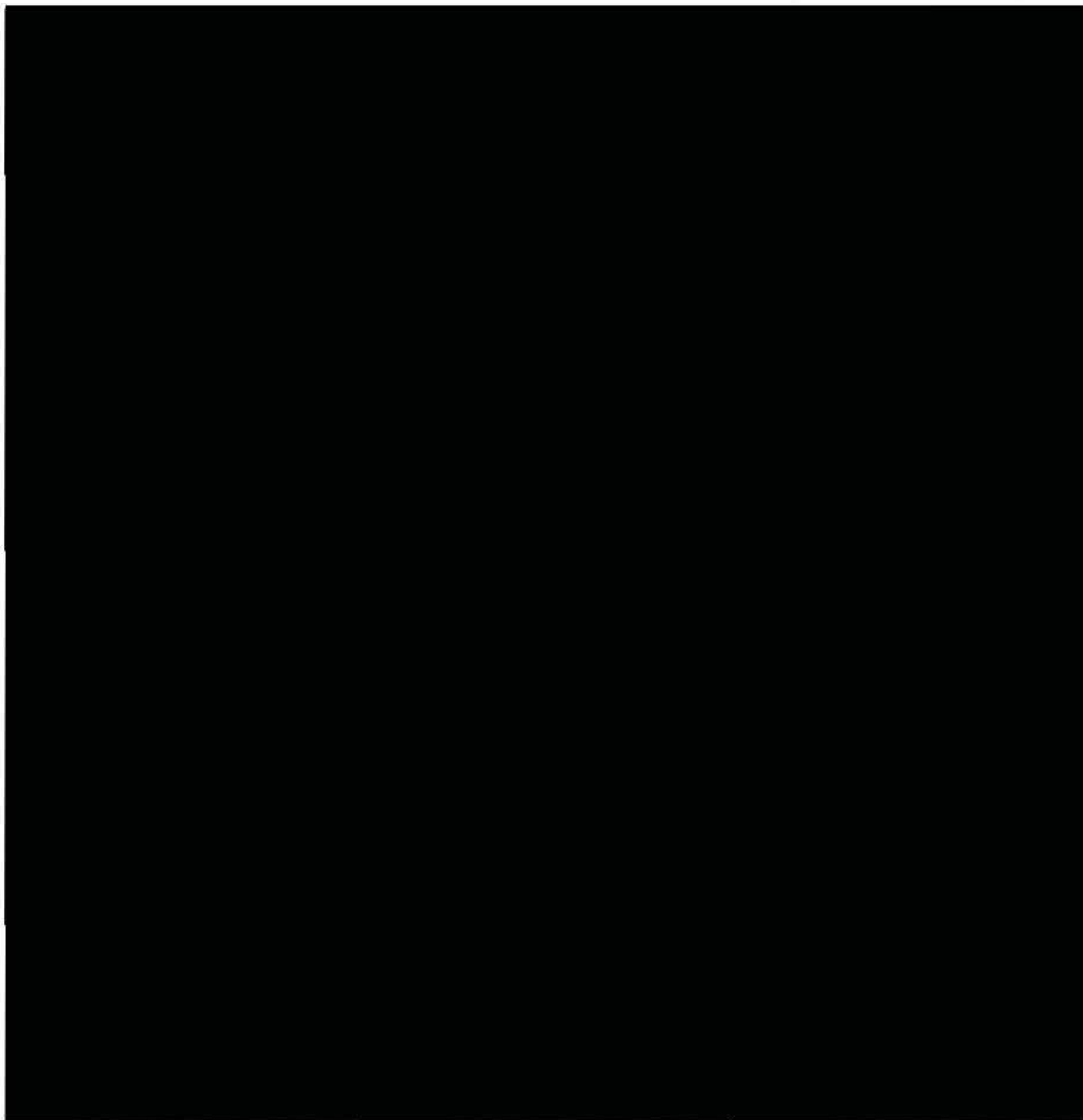
[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

Al-Haramain in Africa: Supporting Al-Ittihad Al-Islami and Other Terrorists

[REDACTED]

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